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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

Donna Brower,
Plaintiff,
v.
McDonald's Corp., a Foreign Corporation
licensed to do business in Nevada,
Defendant.

Case No.: 2:19-cv-02099-GMN-BNW

**DEFENDANT'S SECOND MOTION FOR
EXTENSION OF TIME TO FILE
CORRECTED VERIFIED PETITION
(Second Request)**

Defendant McDonald's Corp. ("Defendant" or "McDonald's"), through its undersigned attorneys and pursuant to Fed. R. Civ. P. 6(b)(1)(A), LR IA 6-1 and LR 7-2, hereby moves the Court for an additional one-week extension of time for Defendant to file its Corrected Verified Petition pursuant to the Court's January 8, 2020 Minute Order (ECF No. 19), from January 17, 2020 to January 24, 2020. Defendant bases this motion on the pleadings and papers on file herein together with the following memorandum of points and authorities. This is the second request by Defendant to extend time to file its Corrected Verified Petition.

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MEMORANDUM OF POINTS AND AUTHORITIES

I. BACKGROUND

On January 8, 2020, the Court granted Defendant’s First Motion for Extension of Time to File its Corrected Verified Petition to allow Petitioner Stacey A. Campbell (“Petitioner”) permission to practice *pro hac vice* in this matter, which extended the deadline for Defendant to file its Corrected Verified Petition to January 17, 2020. (ECF No. 19). Attached as “**Exhibit A**” are Certificates of Good Standing to support Petitioner’s Corrected Verified Petition for the following states: (1) Colorado, (2) Kansas, (3) Missouri, and (4) Wyoming.

Petitioner is currently awaiting the final two Certificates of Good Standing from Arizona and Utah, which will be delivered to Petitioner by mail.

II. ARGUMENT

Federal Rule of Civil Procedure 6(b)(1) governs extension of time and provides that “the court may, for good cause, extend the time... if a request is made, before the original time or its extension expires.” Defendant respectfully requests that the Court grant an additional one-week extension of time for Petitioner to file the remaining two certificates from Arizona and Utah. Petitioner has used his best efforts to comply with the Court’s Order. To further reduce client costs and in the exercise of judicial economy, good cause exists for the Court to extend the deadline to correct the Verified Petition by one week, from January 17, 2020 to January 24, 2020, to allow sufficient time for Petitioner to receive his final two Certificates of Good Standing from Arizona and Utah.

For these reasons and in good faith, Defendant respectfully requests that the Court grant its motion for an additional one-week extension of time, up to and including January 24, 2020, for

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1 Petitioner to file the remaining Certificates of Good Standing in support of the Corrected Verified Petition
2 for Stacey A. Campbell to appear *pro hac vice*.

3 Dated: January 16, 2020.

4 Respectfully submitted,

5 /s/ Dustin Clark
6 Dustin Clark, Esq. (#10548)
7 Holley, Driggs, Walch,
Fine, Puzey, Stein & Thompson

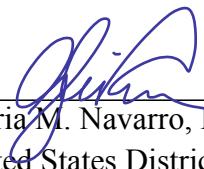
8 Stacey A. Campbell, (Colo. Bar #38378)
9 (*Pro Hac Vice Motion Pending*)
10 Campbell Litigation, P.C.
730 17th St., Suite 730

11 *Attorneys for Defendant McDonald's Corp.*

12 **ORDER**

14 **IT IS SO ORDERED** that Defendant's Second Motion for Extension of Time to File Corrected
15 Verified Petition, (ECF No. 20), is **GRANTED**. Defendant shall file its remaining Certificates of
16 Good Standing by **January 24, 2020**.

17 **DATED** this 23 day of January, 2020.

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19 _____
Gloria M. Navarro, District Judge
20 United States District Court

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CERTIFICATE OF SERVICE

I hereby certify that on January 16, 2020, I caused a true and correct copy of the foregoing
**SECOND MOTION FOR EXTENSION OF TIME TO FILE CORRECTED VERIFIED
PETITION (Second Request)** to be electronically filed with the Clerk of the Court using the CM/ECF
System which sent notification of such filing to the following counsel of record:

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